

**U. S. Department of the Interior
Calendar Year 2003 Progress Report
on the Implementation of Executive Order 13148
“Greening the Government Through Leadership in Environmental Management”**

The U.S. Department of the Interior (DOI) is the Nation’s principal conservation agency. Our mission is to: (1) protect America’s treasures for future generations, (2) provide access to our Nation’s natural and cultural heritage, (3) offer recreation opportunities, (4) honor our trust responsibilities to American Indians and Alaska Natives and our responsibilities to island communities, (5) conduct scientific research, (6) provide wise stewardship of energy and mineral resources, (7) foster sound use of land and water resources, and (8) conserve and protect fish and wildlife. The work that we do affects the lives of millions of people.

The DOI is a large decentralized agency with over 78,315 employees and 183,000 volunteers located at approximately 2,400 operating locations across the United States, Puerto Rico, U.S. territories and freely associated states. The DOI accomplishes its responsibilities on a \$14 billion total annual budget and manages 507 million acres of surface land, or about one-fifth of the land surface in the United States including:

- 262 million acres managed by the U.S. Bureau of Land Management (BLM);
- 96 million acres managed by the U.S. Fish and Wildlife Service (FWS);
- 84.4 million acres managed by the National Park Service (NPS);
- 8.7 million acres managed by the Bureau of Reclamation (WBR) including dams and reservoirs and those associated with Reclamation projects;
- 55.7 million acres managed by the Bureau of Indian Affairs (BIA);
- approximately 1.76 billion acres of the Outer Continental Shelf managed by the Minerals Management Service (MMS);
- over 180,000 acres of abandoned coal mine sites reclaimed through the Office of Surface Mining (OSM); and,
- the U.S. Geological Survey (USGS) conducts groundwater and surface water studies with USGS offices in all 50 states;

The DOI consists of many Bureaus and Offices with different missions that serve a diverse customer and public base. However, as a Department, we reflect a citizen-focused vision for effective stewardship that is centered on the “4C’s” – *communication, consultation, and cooperation, all in the service of conservation.* Within DOI, managing the environment is a critical component of our mission of being good stewards of our Nation’s natural and cultural resources. In keeping with our citizen-focused stewardship role, sound management practices are the keys to success, and lead to more efficient and effective Government practices in support of the President’s Management Agenda. This report reflects both our stewardship role and support of the President’s Management Agenda. In keeping with this role, many of our Bureaus and Offices have already incorporated many innovative practices to their Environmental

Management Systems (EMS) implementation along with other requirements under Executive Order (E.O.) 13148. The report is consistent with the E.O. 13148 report guidance provided by the U.S. Environmental Protection Agency (EPA). It is divided into two main areas: (a) Progress of Departmental Offices and (b) Progress of Departmental Bureaus on E.O. 13148 implementation. To facilitate questions raised in the 2003 guidance document, responses by Bureaus and offices are grouped under major headings. However, since Bureau and office programs differ, their responses will reflect their differences. The Appendix contains supplemental information including a list of the DOI EMS Council members who may be contacted for further information.

PROGRESS OF DEPARTMENTAL OFFICES – E.O. 13148 IMPLEMENTATION

OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE

The Office of Environmental Policy and Compliance (OEPC) develops policy and coordinates and oversees Department-wide compliance with a wide variety of environmental statutes, executive orders, and regulations. OEPC provides for a coordinated and unified approach and response to environmental issues that affect multiple Bureaus in order to ensure that the DOI speaks as one entity with respect to those issues. Also, OEPC provides independent environmental and technical advice to the Secretary of the Interior and other Departmental officials.

These missions are met nationwide through the OEPC Headquarters and Regional Offices. The Headquarters Office located in Washington, D.C. is organized into three teams – Natural Resources Management, Solid and Hazardous Materials Management, and Natural Resources Trust and Response. The OEPC has eight Regional Offices located in Boston, Philadelphia, Atlanta, Denver, Albuquerque, Oakland, Portland, and Anchorage. Each Regional Office is headed by a Regional Environmental Officer who reports to the Deputy Director, and is responsible for all environmental functions within the assigned region. Additional information may be obtained from the OEPC website at: <http://www.doi.gov/oepc>.

The OEPC does not operate any facilities. Therefore, OEPC did not answer facility related questions 6-9 in the calendar year (CY) 2003 Annual Report Guidance. The following information describes OEPC activities relating to E.O. 13148, and corresponds to the sections in the CY 2003 Annual Report Guidance.

Reporting under Sections 502, 503, and 505 of E.O. 13148.

As an office, OEPC does not have anything to report under sections 502 (toxic chemical release reduction goals), 503 (reduction goals for specified chemicals), and 505 (use of ozone-depleting substances) under E.O. 13148.

1. Resources. CY 03 Objective – Resources for EMS implementation are included in the

agency's FY 04 budget request.

The OEPC in coordination with DOI's Office of Budget developed criteria for DOI's FY 2004 and FY 2005 Budget Formulation Guidance for Bureaus to request funding specifically for EMS implementation. The criteria specifically provided funding request guidance to Bureaus for corrective actions as a result of environmental audit findings at facilities and for EMS program implementation. The OEPC has no line item budget and is funded principally through the budget of the Office of the Secretary. Therefore, EMS implementation must compete along with other equally important statutory requirements. Within OEPC, the Solid and Hazardous Materials Management Team has 4 employees involved with environmental compliance management. Furthermore, Section 4.8 (E) in DOI's EMS policy (515 DM 4) requires Heads of Bureaus and Offices to ensure that adequate resources and funding are available for EMS implementation. Section 4.8 (F) requires that program managers (e.g., area/field office managers, district managers, refuge managers, park superintendents) must ensure EMS implementation and to request such funding through their respective Bureau budget process. The Budget Fact Sheet on EMS that was developed by the E.O 13148 Workgroup was distributed to both program and budget offices.

2. Guidance. CY 03 Objective – Agency has issued EMS implementation guidance for use by appropriate facilities.

To assist in DOI-wide EMS implementation, a DOI EMS Council was established under the provisions of 515 DM 4 and formally chartered under Environmental Compliance Memorandum (ECM) 03-02. (The ECM is publicly available at <http://www.oepc.gov/ecms.html>). The Council is chaired by OEPC. The Council makes recommendations to senior DOI management on EMS implementation and provides a forum to raise EMS crosscutting issues that affect Departmental Bureaus and Offices. Furthermore, the Council promotes common efficiencies and sharing of resources in order to foster environmental stewardship throughout DOI.

Various EMS resources and guidance documents have been issued to the Bureaus and are available on the Greening the DOI website at: <http://www.doi.gov/greening>. The OEPC makes available to its Bureaus and offices the Federal Environmental Assessment Management (TEAM) Guide, i.e., the environmental auditing protocols developed by the U.S. Army Construction Engineering Research Laboratories. The Federal TEAM Guide is accessible to Bureaus through OEPC's website via password access.

3. EMS training for senior-level managers. CY 03 Objective – Agency has provided EMS training for appropriate agency-level senior managers.

At the Department level, the DOI Conferences on the Environment are the principal means to exchange technical information on various environmental procedures and provide environmental training for senior managers and staff of DOI Bureaus and Offices. It is the only Department-wide environmental conference available where representation of DOI leadership is visible and

that offers both staff and senior level management opportunities to receive technical information and training in a variety of environmental areas. The OEPC sponsors such conferences along with a Bureau host. These conferences took place in 1993-1995, 1999, 2001, and 2003. Our 2003 conference, hosted by the FWS, was held in Phoenix, Arizona. It featured technical presentations and training in many environmental areas. There was a heavy emphasis on environmental compliance and EMS through plenary, poster, panel sessions and paper presentations. In addition, training in various environmental areas, including EMS was offered and supported by EPA headquarters and regional personnel and representatives from the Office of the Environmental Executive.

Secretary Norton addressed conference attendees through videotape during the conference Opening Plenary Session. Both environmental compliance and EMS implementation were key primary features addressed in her speech. Ms. Nina Rose Hatfield, Deputy Assistant Secretary – Budget and Finance addressed environmental liability issues. Mr. James Connaughton, Chair, Council on Environmental Quality was the principal Opening Plenary Session speaker and addressed conference attendees on EMS and other environmental issues.

The Conference Capstone Plenary Session was an interactive panel dialogue on current EMS implementation issues that included questions and answers from the audience. It featured Mr. John Howard, Federal Environmental Executive and Mr. Jay Benforado, Director; EPA National Center for Environmental Innovation along with Ms. Suellen Keiner of the National Academy of Public Administration. Ms. Karen Wade, Director of the National Park Service Intermountain Region moderated the Capstone Plenary Session.

Frequency of training depends upon the level of funding available and the individual Bureaus are responsible for training of their personnel. OEPC does occasionally sponsor special sessions where outside experts may discuss various environmental issues. For example, in August 2003, OEPC invited EPA Region 3 to talk to both Bureaus and other Federal agencies about EMS in buildings. Also, we have sponsored “brownbag” lunches for the Bureaus on numerous “greening” initiatives.

4. Agency EMS policy: CY 02 Objective – Agency top management has signed an agency EMS policy.

On August 26, 2003, Secretary Norton issued a Secretarial Memorandum on “Improving Environmental Compliance and Performance through Environmental Management Systems.” This memorandum commits DOI to environmental compliance and EMS implementation. (Copies of the memorandum were given to EPA and the Office of the Federal Environmental Executive). Also, OEPC has issued Department-wide policies that incorporate DOI’s commitment to compliance with environmental requirements (see below). These policies are currently available through the DOI Main Webpage located at the following Internet address: <http://elips.doi.gov>.

Departmental Manual Chapter, 518 DM 4, “Environmental Management Systems” dated October 2, 2002; Departmental Manual Chapter, 515 DM 2, “Environmental Auditing” dated September 8, 1997; Departmental Manual Chapter, 515 DM 3, “Environmental Management Recycling Programs” dated February 5, 1998; Departmental Manual Chapter, 518 DM 1, “Comprehensive Waste Management” dated March 3, 1994; Departmental Manual Chapter, 518 DM 2, “Compliance with Waste Management Requirements” dated June 30, 1994.

5. Program to conduct facility environmental compliance audits: CY 02 Objective – Agency has developed and implemented a program to conduct facility environmental compliance audits.

Secretary Norton has repeatedly emphasized that compliance with environmental laws and regulations remains a high priority for DOI. The policy (Departmental Manual, Part 515, Chapter 2, “Environmental Auditing”) requires environmental auditing of all DOI facilities. The policy is publicly available at the following Internet website address:
[www://elips.doi.gov/elips/release/3172.htm](http://elips.doi.gov/elips/release/3172.htm).

Each Bureau is responsible for developing and implementing its respective environmental auditing program. The OEPC provides the Bureaus with the Federal environmental protocols developed by the U.S. Army Construction Engineering Research Laboratories called the Environmental Assessment Management Guide or TEAM Guide. The TEAM Guide is available to Bureaus on the OEPC website for use by the Bureaus and has been updated on a quarterly basis.

As part of DOI’s annual audit reporting requirement, Bureaus provide summary information on their auditing programs and activities to OEPC. Such information includes the cumulative number of facilities audited to date, number of facility audits scheduled for the next fiscal year, major audit issues identified in the reporting year, and the total cost of the Bureau audit program for the reporting fiscal year. The OEPC then prepares a DOI Summary of the FY Annual Report on Bureau Environmental Auditing Programs and Activities. Summary reports were completed for fiscal years 1999-2003. The cumulative total of all DOI owned/operated facilities audited as of the end of FY 2003 was 2,541 with an additional 426 audits scheduled during FY 2004.

Other.

Award programs.

The OEPC administers both the White House Closing the Circle Award for DOI and the DOI Environmental Achievement Award. The DOI Environmental Achievement Award recognizes exceptional environmental achievements that highlight conservation of resources through cooperation, consultation and communication within Bureaus or Offices, either by individual employees or teams, or by contractors to a Bureau or Office. The Award follows the intent of the following: DOI policy for comprehensive waste management for its lands and facilities (518

DM 1); Executive Order (E.O.) 12856, Federal Compliance With Right-To-Know Laws and Pollution Prevention Requirements; E.O. 13101, Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition; and E.O. 13148, Greening the Government Through Leadership in Environmental Management, and the Strategic Plan for Greening the Department of the Interior Through Waste Prevention, Recycling, and Federal Acquisition. Areas of recognition include: Waste/pollution prevention, recycling, environmentally preferable and affirmative procurement, facility environmental excellence, EMS, environmental stewardship, and education and outreach.

Other environmental and conservation improvement initiatives are also considered as well. An Awards Committee consisting of representatives of DOI Bureaus and Offices review nominations that are submitted and perform the selection of award recipients.

A total of nine recipients were selected for the DOI Environmental Achievement Award in 2003. Also, there were six DOI recipients of the White House Closing the Circle Award in 2003. Information about the recipients of both awards may be obtained at the Greening Interior website: <http://greeninginterior.doi.gov/awards/index.html>.

NATIONAL BUSINESS CENTER

The National Business Center (NBC) is submitting the following progress report on its activities relating to E.O. 13148.

Reporting under Sections 502, 503, and 505 of E.O. 13148.

The NBC addressed reduction goals for Federal agency release of toxic chemicals by awarding a multi-year custodial contract which began using environmentally-safe and healthful custodial products in the Interior Complex. Chemical cleaning products used under this contract meet or exceed mandatory criteria for reducing the release of toxic chemicals. Contract specifications include the following: must not be a hazardous waste (when disposed of); must not be packaged in an aerosol container; must not contain any probable or known carcinogens, must not contain any ingredients that are designated as “Toxics of Concern” to the Chesapeake Bay, must minimize use of dyes and fragrances, and must minimize skin, eye, and respiratory irritation.

Additionally, all the paper products have the desirable characteristic of having been manufactured without the use of elemental chlorine for dyeing and bleaching. We are working with the General Services Administration (GSA) to utilize the Main Interior Building Modernization Project to evaluate environmentally preferable products as it is a U.S. Green Building Council Leadership in Energy and Environmental Leadership (LEED) pilot project. Work being accomplished as part of this project will earn credit toward building certification if permitted by the LEED pilot program. The following actions were taken by the NBC to reduce and manage the use of ozone depleting substances:

As part of the Main Interior Building Modernization Project, the chillers are being replaced over the next ten years. The refrigerant chosen by GSA is R-134-A which is hydro-chlorofluorocarbon, a refrigerant that is much more environmentally-friendly than a standard chlorofluorocarbon (CFC) refrigerant. As part of the South Interior Building Chiller Replacement Project, the chillers will be replaced in CY 2004. The refrigerant chosen by GSA is R-123. The custodial contract for the Interior Complex requires the use of environmentally-friendly products including low- or no-volatile organic cleaning compounds and chemicals. The NBC banned aerosol containers from use in the Interior Complex. Only pump sprayers can be used to dispense cleaning chemicals. The NBC prohibited the sale of products in aerosol containers at the office supply store in the Main Interior Building.

1. Resources. CY 03 Objective – Resources for EMS implementation are included in the agency's FY 04 budget request.

The NBC requested \$100K in the FY 2004 Departmental budget request. The Department did not fund our request, and as a result we will be unable to fully comply with the mandate to establish an EMS. The NBC is relying on the Department to fund EMS implementation. The NBC is legally authorized to operate as a fee-for-service, full-cost-recovery business operation. We cannot subsidize one customer at the cost of another. To implement this absent funding would be counter to NBC's legal mandate. Included as part of the Division of Facilities Management Services budget request as stated in the question above, NBC did not receive the \$100k funding request. The NBC has an individual working part-time with its seven directorates to implement EMS. Until funding is received, NBC will not be able to fully implement an EMS program. NBC lacks funding to develop, implement, and maintain a complete EMS program.

2. Guidance. CY 03 Objective – Agency has issued EMS implementation guidance for use by appropriate facilities.

The NBC Division of Facilities Management Services; Safety, Health, and Environmental Team has been tasked with implementing EMS NBC-wide. However, there are no full-time FTE resources assigned to EMS; it is a collateral duty assignment. NBC has not issued guidance to our facilities and organizations in implementing EMS to date. When guidance is finally issued, it will be distributed through e-mail to environmental coordinators.

3. EMS training for senior-level managers. CY 03 Objective – Agency has provided EMS training for appropriate agency-level senior managers.

NBC plans on providing EMS training to its senior-level management. The Industrial Hygienist has received limited EMS training from EPA during October and November 2003. The training included an overview of EMS, implementation steps, and auditing requirements. NBC plans to use training materials developed by the Bureaus and other Federal agencies where they exist.

4. Agency EMS policy: CY 02 Objective – Agency top management has signed an agency

EMS policy.

NBC plans to issue an EMS policy.

5. Program to conduct facility environmental compliance audits: CY 02 Objective – Agency has developed and implemented a program to conduct facility environmental compliance audits.

NBC has not developed nor implemented a program to conduct compliance audits to date.

6. Facility-level determination of “appropriate facilities” for EMS implementation. CY03 Objective – Agency has identified initial list of facilities where an EMS will be implemented.

NBC is the process of identifying its “appropriate facilities.” (Note: The NBC has approximately 15 buildings including the Main and South Interior Buildings and some additional warehouses nationwide where NBC personnel are located. NBC needs additional time to determine its appropriate facilities).

7. Facility EMS policy. CY03 Objective – Appropriate facilities have issued an EMS policy statement.

NBC has not issued facility EMS policy statements to date.

8. Facility implementation training. CY03 Objective – Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.

NBC has not provided EMS training to the facility staff to date.

9. Facility significant environmental aspects. CY 03 Objective – Appropriate facilities have identified and documented their significant environmental aspects.

NBC has not identified significant environmental aspects of its managed facilities.

OFFICE OF ACQUISITION AND PROPERTY MANAGEMENT

Reporting under Sections 502, 503, and 505 of E.O. 13148.

The Office of Acquisition and Property Management (PAM) issued policy guidance on May 27, 1993, in a DOI Acquisition Policy Release (DIAPR) 93-18 which calls for taking action to minimize the procurement of ozone depleting substances (ODS) by informing engineering and environmental staffs of E.O.12843 requirements; initiating program review of standards and specifications to remove ozone-depleting substances; and initiating data collection by program

offices on actions taken to prepare for subsequent progress reporting.

A policy memorandum was issued in October 1995, apprising property managers about chlorofluorocarbon and “Halon” turn-in program for maintaining reserves of these products by the Defense Logistics Agency of the Department of Defense. Under DIAPR 97-2, issued December 2, 1996, DOI established policy to maximize the use of alternatives to ODS in specifications and contracts in accordance with FAR clause requirements. Clauses Federal Acquisition Regulation (FAR) 52-223.11, "ODS" and FAR 52-223-12, “Refrigeration Equipment and Air Conditioners” are required clauses for inclusion in contract requirements.

Note: No further information was provided by PAM specific to EMS implementation.

Other.

Alternative Fuel Vehicle Acquisition.

During the past 7 fiscal years, DOI consistently has been one of the Federal Government’s most successful programs, increasing its inventory of Alternative Fuel Vehicles (AFVs) in the fleet from about 200 AFVs in FY 1998 to approximately 1600 by FY 2004. In FY 1996 and 1997, with few AFVs on the market, limited fueling and no financing options, DOI fell short of the Energy Policy Act (EPACT) of 1992’s AFV acquisition requirements. This policy requires that 75% of new light-duty vehicles leased or purchased in Metropolitan Statistical Areas (cities with populations of 200,000 or more) are AFVs. Since FY 1998, DOI has been able to meet or exceed the EPA requirements. This can be attributed to DOI’s commitment to environmental stewardship, increased AFV production by vehicle manufacturers, growth in the fueling infrastructure, and a creative financing arrangement with GSA. Individual Bureau goals are compliant with EPACT.

The uses of AFVs are cleaner burning than conventionally fueled vehicles. AFVs are important to DOI’s energy strategy, to help reduce the Nation’s dependence on foreign crude oil. The Government-wide Federal Automotive Statistical Tool (FAST) implemented in FY 2000 is evolving as an important management system for reporting AFV acquisition information and alternative fuel consumption. The DOI is committed to work with the Department of Energy and GSA on strengthening FAST. The FAST consolidates reporting of AFV-related information through a web-based system merging information generated by DOI, the Bureaus and facilities Nation-wide, as well as GSA.

Computer Demanufacturing.

DOI facilities dispose of electronics in a safe and environmentally compliant way. In 2001, DOI and the Bureau of Prison’s Federal Prison Industries (FPI) signed a Memorandum of Understanding (MOU). The MOU provides recycling and demanufacturing service for DOI’s excess unserviceable and obsolete electronic equipment nationwide. Under this MOU, FPI is

charged with dismantling and recycling transferred electronic equipments and components, and removing and disposing of hazardous substances, material and wastes from the equipment, in accordance with Federal, state and local laws and regulations.

PROGRESS OF DEPARTMENTAL BUREAUS – E.O. 13148 IMPLEMENTATION

BUREAU OF INDIAN AFFAIRS

The Bureau of Indian Affairs (BIA) continues to expand its EMS at the Bureau, regional and field unit-level. In 2003, the BIA had efforts in the areas of Bureau-level policy, goals and objectives, environmental guidance and data management, and communication to address gaps identified in the Bureau-level EMS and to support a more robust EMS Bureau-wide. The BIA also began to assess the status of regional EMSs through a gap analysis conducted at one regional office. The BIA also continued efforts to improve field unit-level EMSs through additional pilot activities, and development of BIA field-level guidance materials. In addition, activity continued in several related areas including the Bureau-wide Environmental Management Audit Program (EMAP) and the Bureau Greening Program for environmentally preferable purchasing and waste reduction.

CY 2004 is planned as a building year for the BIA EMS. Bureau-wide policy and guidance are anticipated to be completed and promulgated and pilot EMS activities will be expanded to test and refine BIA model EMSs. EMS gap assessments and awareness will continue through the Bureau-wide EMAP and plans and expectations will continue to be communicated to senior managers within Central office, regions and at the facility level, setting the stage for successful roll-out of the Bureau EMS program in CY 2005.

Reporting under Sections 502, 503, and 505 of E.O. 13148.

The BIA's use of toxic chemicals and toxic chemical releases continues to be limited. BIA facilities (i.e., agencies) that are required to report requirements under Section 311 (TIER I and II) and Section 313 (Toxic Release Inventory) are minimal. The BIA's facilities are audited under the EMAP relative to EPCRA compliance and Green Procurement. Potential toxic substance reductions are noted during EMAP audits using these protocols. Best Management Practices are recommended on a facility-by-facility basis to purchase products with reduced toxicity. Toxic reduction at BIA facilities is being handled as part of a comprehensive Bureau-wide Greening Program. The 2003 strategy to address Section 502 was not fully achieved in 2003, but is anticipated for completion in 2004. Components of this strategy are as follows:

The BIA Division of Environmental & Cultural Resources Management (DECRM) will conduct a BIA-wide survey to identify those facilities that report under EPCRA and to obtain information on the use of toxic chemicals within the BIA. The DECRM will analyze this information and identify potential toxic chemicals for targeted substitution and reduction. The DECRM will report its results to the EMS and Environmental Preferable Products (EPP) Procurement

Workgroups. Based upon direction from the Workgroups, the DECRM will develop and issue field guidance on the reduction of these targeted substances, if any. Conformance with this field guidance will be monitored through the BIA EMAP and green procurement data calls to be developed.

The BIA continues to assess the use of Class I ozone depleting substances (ODSs) at Bureau facilities during EMAP Audits. The primary use of Class I ODSs is in halon fire suppression systems for critical file storage facilities. Recommendations to replace or retrofit Class I ODS systems are provided on a facility-by-facility basis. All facilities will receive baseline audits by 2010 and will have established retrofit and replacement plans if Class I ODSs were found.

1. Resources. CY 03 Objective – Resources for EMS implementation are included in the agency's FY 04 budget request.

As part of its efforts to oversee the Bureau's environmental initiatives, DECRM develops and manages the BIA Central Office environmental program budget. This budget includes funds that will be used for, but are not specifically dedicated to, EMS project implementation. Although a variety of activities planned for 2004 support the BIA's overall EMS implementation strategy; approximately \$10,000 will be used for contractual support for EMS implementation. BIA staff time and travel has been planned for EMS tasks such as Workgroup meetings, field-level and regional gap assessments and pilot projects, and tools development.

2. Guidance. CY 03 Objective – Agency has issued EMS implementation guidance for use by appropriate facilities.

The Chief, DECRM has been assigned responsibility to oversee EMS implementation at the BIA. EMS activities are however, supported by a much broader group. A Workgroup has been formed that has representatives from a variety of BIA headquarters offices, regional offices and facilities. The Division of Safety Management and the Office of Facilities Management and Construction also play a role in the BIA EMS implementation as relates to their areas of responsibility. The DECRM works closely with these offices to ensure an integrated approach to environmental management within the Bureau. At the regional level, regional environmental scientists assist in facilitating the implementation the BIA EMS at both the region and facility level. At facility level, EMS responsibilities are generally integrated into existing staff roles and responsibilities. In some cases, at larger BIA locations, a dedicated environmental professional may be on staff. However, due to the relatively small size and complexity of BIA operations as compared to many other Federal facility operations, in most cases, this responsibility is collateral.

BIA is currently undergoing a significant Bureau-wide reorganization. While it is anticipated that DECRM will continue to take the lead on EMS implementation at the Central office, supporting roles and responsibilities at the regional and field level may change over time to support this reorganization. In 2003, the DECRM continued to utilize the EMS fact sheet

developed in 2002 to provide general environmental awareness to Bureau personnel. The fact sheet was distributed to RESs and other key BIA personnel to provide an overview of EMS concepts and elements, E.O. 13148, and the BIA's efforts relating to EMS. The DECRM also continued to utilize the EMAP audit protocol on EMS as guidance at the facility and regional level. In 2003, the DECRM developed a draft model "facility-level" documented environmental management program or "plan" utilizing experience gained at several pilot facilities. This draft plan was reviewed by a Bureau EMS Workgroup consisting of agency, regional and field unit managers and environmental professionals.

The model plan is currently being revised to reflect Workgroup comments. The facility-level model will also be modified to provide guidance for regions and multi-facility units (e.g., school districts, law enforcement districts). These models will provide a consistent Bureau-wide format with which to document Bureau EMSs. A BIA EMS Guide is also being developed which will provide Bureau personnel detailed information on Bureau policies and procedures for implementing EMSs and how to utilize the EMS models at each level in the organization. These documents are anticipated to be completed by September 2004. The EMS guidance will be part of a comprehensive Compliance Assistance Tool Kit that will be distributed on CD and potentially the BIA Internet. These materials will be provided to OEPC when they are completed.

3. EMS training for senior-level managers. CY 03 Objective – Agency has provided EMS training for appropriate agency-level senior managers.

The BIA strategy for providing manager training on EMS and other critical environmental topics is to conduct presentations during existing workgroup meetings, seminars and conferences. This approach minimizes travel costs for the Bureau and provides the opportunity to reinforce the integration of environmental management as a part of doing business in the Bureau.

In 2003, the BIA continued to use the EMAP audit process as an effective means to provide facility-level manager training on EMS. EMS concepts and Federal requirements were discussed during the audit process and audit findings and recommended corrective actions related to EMS implementation were commonly developed. Processes to address compliance and best management practice-based findings using a facility-level EMS was a common strategy promoted through the EMAP. It is anticipated that, given travel restrictions and Bureau priorities, and the effectiveness of the training process to date, the strategy to tag on EMS/Environmental Awareness training to program-level meetings conducted for other purposes will continue in CY 2004. Emphasis on EMS solutions during EMAP audits will also continue. In addition, to augment these strategies, a BIA Environmental Workshop that will bring together regional environmental scientist took place in April 2004. EMS was a topic at that workshop. Although, EMS awareness training for senior managers is not anticipated at this time, DECRM will continue to explore new ways to train senior managers on EMS and other critical environmental topics and will augment the existing strategy as opportunities are identified.

A critical component to BIA's environmental and cultural resource management program is working with tribes to help manage community and reservation environmental aspects and impacts. In CY 2003, the BIA continued to participate with EPA Region 4 and the Eastern Band of Cherokee Indian of North Carolina in the development of a tribal EMS. Several workshops were held in which BIA participated. It is anticipated that the results of these efforts will provide valuable tools and lessons learned that the BIA can help to transfer to other tribes through regional and national tribal environmental councils, BIA facility-level, regional and national technical assistance initiatives.

4. Agency EMS policy: CY 02 Objective – Agency top management has signed an agency EMS policy.

The DECRM has developed and revised a draft policy to be included in the BIA Indian Affairs Manual (IAM). These revisions include a section dedicated to EMS. The revised policies are currently undergoing review and are anticipated to be promulgated in September 2004.

5. Program to conduct facility environmental compliance audits: CY 02 Objective – Agency has developed and implemented a program to conduct facility environmental compliance audits.

The BIA continues to conduct multimedia environmental audits under the BIA EMAP. FY 2003 was the first full program rollout year for the EMAP. Sixteen "agency" audits were conducted in FY 2003 that included 66 individual locations throughout the U.S. These included BIA Office of Indian Program (i.e., agencies), Office of Indian Education Programs (OIEP) (i.e., schools) and Office of Law Enforcement Services (OLES) (i.e., detention centers and police departments). In addition, in 2003, BIA continued to make significant progress towards the implementation of an EMAP database module to its Facilities Management Information System (FMIS). This system will provide the BIA a means to maintain audit data, budget for corrective action and monitor progress using the Bureau-wide facilities management tool. The module is expected to be ready to filed test by the middle of CY 2004.

An EMAP plan for 2004 has been prepared and is being implemented. The Plan calls for the completion of an additional 15 audits including approximately 50 facilities. Additional facilities may be audited under special circumstances. In the Fall of 2003, an EMAP Workgroup was convened to assess the progress of the EMAP and recommend any changes in policies or procedures. Based upon the Workgroup comments, the EMAP Operating Guide is being revised and the IAM section devoted to the EMAP has been revised and is undergoing review by BIA central, regional, and agency environmental personnel. The revised Operating Guide and policy are anticipated to be promulgated by the end of CY 2004.

6. Facility-level determination of "appropriate facilities" for EMS implementation. CY03 Objective – Agency has identified initial list of facilities where an EMS will be implemented.

The BIA is uniquely organized at the “facility” level. Facilities are generally organized by BIA “agency.” An agency consists of multiple building and operations that may include administrative offices, roads, irrigation, forestry shops and others. These facilities may be grouped at one location or may be spread among multiple locations. Agencies are administered by a Superintendent. The Office of Indian Education (OIEP) operates schools within the BIA. These schools are organized by districts which are managed by Education Line Officers (ELOs). The district may roughly correspond to a BIA Agency. Although some services may be shared by the Agency and the schools, they generally are often operated autonomously. Law enforcement facilities (e.g., police stations, detention centers) are managed under the OLES. These facilities are organized by districts and are managed by a Chief of Police. Facility management for these facilities may be provided by the Agency. BIA facilities and operations including Agency, OIEP and OLES facilities may also be may be operated under contract, grant or compact by a tribe.

The issue of defining for the Bureau, what an “appropriate facility” is was taken up by the BIA EMS Workgroup in the fall of 2003. A proposed strategy was discussed and it was determined that most individual Bureau facilities are of small size and complexity and therefore are not appropriate facilities for a complete EMS. However, when facilities are bundled at the Agency, school district or law enforcement district level, they could benefit from this level of environmental structure. The current plan is to implement EMSs utilizing this bundling approach, developing EMSs that are organization specific (i.e., agency, OIEP, OLES). In those school districts where a large high school is present, a separate EMS may be developed for that school. In some circumstances, the size and complexity of Bureau operations will not warrant an EMS even when bundled at the district level. This is likely when many of the operations have been contracted or granted to the tribe. In these cases exceptions will be made and complete EMSs will not be developed.

In 2004, the BIA will continue efforts begun in 2003 to utilize the BIA-wide FMIS to obtain information on the size (e.g., number of buildings), complexity (e.g., range of operations), and operational responsibility (i.e., BIA or tribe) of agencies and schools. Specific threshold criteria and ranking for each of these indicators will be established by DECRM and approved by the BIA EMS workgroup. The maximum number of EMSs, based on these criteria would be the number of agencies plus the number of school districts. However, it is anticipated that the size and complexity and operational responsibility of over a third of these “facilities” will not warrant a formal EMS.

It should be noted, although a formal EMS may not be warranted at all BIA agencies and schools, the BIA EMAP protocol on EMS includes an assessment of EMS elements at all locations and the development of recommendations for the institution of EMS elements where appropriate. As such, all BIA locations are likely to have simple EMS elements such as standard operating procedures and key environmental programs. It should also be noted, the BIA recognizes that EMS principles are valuable at the regional and Headquarters level.

Opportunities to enhance and document the EMSs will be explored at these organizational levels as well as at the “facility” level. As indicated in Agency – Level No. 3 above, the BIA also has an interest in assisting tribes in developing their own EMS, particularly in locations where BIA still owns the property but the tribe is conducting activities under contract or grant. These facilities are included in the BIA EMAP. EMS approaches are advocated to the tribes through the EMAP process. The BIA will also continue to work through the EPA Region 4 partnership and will look for other opportunities to advance EMS and share its EMS guidance with tribes.

7. Facility EMS policy. CY03 Objective – Appropriate facilities have issued an EMS policy statement.

At this time one pilot Agency is in the process of implementing its EMS and has issued an EMS policy. Several other pilot EMSs were underway in 2003. However, no formal policies have been issued at these locations. Several additional pilot EMSs are planned for 2004 including those for regional, OIEP and OLES facilities. As a result, it is anticipated that by the end of CY 2004, at least six facility-level EMS policies will be issued. When the BIA EMS program is rolled out in 2005 a larger number of EMS policies are expected. The BIA EMS models currently under development provide a template EMS policy for facilities to modify and adopt.

8. Facility implementation training. CY03 Objective – Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.

Two pilot agencies have conducted informal training to key staff on environmental management and environmental management systems. Additional facility-level EMS training is anticipated in CY 2004 as pilots currently underway and planned for CY 2004 continue. When the BIA EMS program is rolled out in 2005 a larger number of EMS policies are expected.

The BIA EMS models currently under development provide template EMS training materials for facilities to modify and adopt. When these materials are finalized, copies will be provided to OEPC.

9. Facility significant environmental aspects. CY 03 Objective – Appropriate facilities have identified and documented their significant environmental aspects.

At this time two pilot Agencies is in the process of implementing its EMS and have formally identified their key aspects and impacts. Additional facility-level aspect and impact analysis is anticipated in CY 2004 as pilots currently underway and planned for CY 2004 continue. The DECRM is currently developing a master list of aspects and impacts for Bureau facilities based upon EMAP, pilot activities and other field experiences. These master lists will define aspects and impacts for facilities in each organizational type (agency, OIEP, and OLES) as well as regional offices and the Central Office. These lists will be provided in the BIA EMS guidance currently under development and should facilitate the facility-level aspects and impact process which can sometimes be a nebulous exercise for facility managers. Agencies are urged to use

the annual report to address and describe the general status of agency efforts to implement EMS at their facilities.

The DECRM, in cooperation with the BIA EMS Workgroup is currently assessing means to obtain information on and report on EMS implementation progress at the regional and facility. The EMS Self-Declaration Protocol developed by the E.O. 13148 Interagency Environmental Leadership Workgroup is being considered in this process. Plans and guidance on annual reporting is anticipated to be complete by the end of CY 2005 in order to collect Bureau-wide information from the first year of the Bureau EMS Program rollout.

Other.

The most significant challenge encountered in implementing EMS within the Bureau results from the distributed organizational structure within the Bureau. Multiple organizational units are encountered at the facility-level with different objectives, lines of authority and responsibilities. In some cases these organizations operate in relative autonomy while in others, resources and personnel may be shared. The BIA EMS needs to accommodate these varied organizational relationships. The BIA is currently undergoing a Bureau-wide reorganization. Until the reorganization process settles, the strategies for implementation of EMS are subject to change and the process is further complicated. A second challenge is not an unusual one within the Federal sector, that of resources. While it is recognized that BIA environmental performance will improve in the long term as a result of EMS implementation, there are upfront commitments of resources including labor and funding that must be made in order to effectively develop and implement the program. The Bureau is confronted with a variety of conflicting "top priorities" that erode the resource base for longer term programs. These constraints can be seen in the extended timelines of environmental programs such as the EMP and EMS.

Despite these challenges and the fact that the BIA is still in building stage of EMS development, the benefits of facility-level EMS activities are already being realized. A case in point is the progress seen at the Mescalero Agency in New Mexico, one of the first EMS pilots for the Bureau which was documented in a Closing the Circle Award nomination package submitted earlier in CY 2004. As the BIA continues through the EMS Program development process in CY 2004 and implementation in CY 2005, additional data on challenges and successes will become available.

BUREAU OF LAND MANAGEMENT

The Bureau of Land Management (BLM) is pleased to report the following activities as part of the Department's CY 2003 report.

Reporting under Sections 502, 503, and 505 of E.O. 13148.

The BLM reports its use of fire retardant, which is mixed on a batch basis as an aqueous solution

and applied to wildland fires. The active constituents, ammonium sulfate, and/or ammonium phosphate, contains the ammonium ion in a stable form. The fire retardant is used as intended and the amount released to the environment depends on the fire season. There are no viable substitute products at this time. However, decreasing fire retardant use is expected to be a side benefit of the national fuels reduction program. The need for fire retardant will decline as the Federal Government and its state partners reduce heavy fuel loads arising from past disruptions of natural fire cycles and other land management practices. Applying a variety of fuel treatment types, such as mechanical thinning and controlled burning, will reduce the intensity and severity of wildland fires and restore health to fire-adapted ecosystems. The primary fuels reduction efforts are in wildland-urban interface areas where fire suppression is most critical and use of fire retardant has been extensive. Eliminating heavy fuel loads in wildland-urban interface areas will reduce the risks to communities and result in a corresponding decrease in fire retardant applications.

The BLM incorporates sustainable design features in new construction to the greatest extent possible. A number of features reduce air conditioning load and consequently the use of coolants and refrigerants. These include direct/indirect evaporative cooling, interior/exterior light shelves on south windows, low energy glazing, increased building shell insulation, and energy and atmosphere through systems commissioning energy performance. In 2003 the BLM installed a new humidification system at the Anasazi Heritage Center (AHC) in Colorado. Located within the Canyons of the Ancients National Monument, the AHC is an interpretive and cultural resource facility with permanent and temporary exhibits, collections storage, conservation and research laboratories, and a library, theater and bookstore. Priceless Native American artifacts are stored and displayed at the facility. The AHC preserves approximately 2 million artifacts and records for current and future researchers and historians. The project involved a new centralized air conditioning and heating system and duct work and boiler. The chiller will utilize R-22, chlorodifluoromethane, the most environmentally friendly refrigerant available for this application.

The BLM installed electronic sensors at its Headquarters building in 2003. Electronic sensors were also installed throughout the state of Utah. Additionally, the BLM purchased demonstration systems furniture with the intentions of obtaining lessons learned and implementing them across the Bureau. In accordance with mandated policies, the BLM continues to purchase environmentally preferable products. All service contracts include environmental preferability provisions. Green procurement policies, guidance, and case studies are posted on BLM's Acquisition Internal Homepage.

Beginning in 2003, field offices are required to submit a Fleet Plan which, among other things, identifies ways to reduce fleet sizes and vehicle sizes in order to meet the requirements of E.O. 13148. The BLM is continuing to seek vendors who will provide service for alternative fueling options, such as bio-diesel or Ethanol 85, in remote field locations. The Bureau plans to buy high-fuel economy, hybrid 4x4 vehicles as soon as they become available from the manufacturers.

In the area of newly constructed facilities, the BLM is pursuing a Leadership in Energy and Environmental Design (LEED) Gold certification for its new field office building in Rawlins, Wyoming. The BLM is exploring opportunities for the installation of off-grid lighting (Moon Cell Technology) in some remote areas of Oregon and Utah. The vast majority of the Bureau's Office space is in commercially leased buildings and the BLM's goal is to be a leader in greening space leases. Among other provisions, its new lease agreements require energy efficiency, water conservation, recycling, and green cleaning in leased spaces. The BLM has also instituted a Five Year Space Leasing Program which requires all states to submit a space reduction and collocation plan for all leased facilities. The plan is to reduce space in each facility to 200 square feet per person by reducing the environmental effects of building new facilities. This plan is instituted by using natural resources for building projects and efficiently managing the facility in accordance with the aforementioned environmentally preferable provisions. The Five-year Space Plan will not only reduce space but also reduce leasing costs, allowing BLM to utilize its savings for other greening efforts.

1. Resources. CY 03 Objective – Resources for EMS implementation are included in the agency's FY 04 budget request.

No further information was provided by BLM specific to resources for EMS implementation.

2. Guidance. CY 03 Objective – Agency has issued EMS implementation guidance for use by appropriate facilities.

A formal Environmental Management System (EMS) is currently being developed. Meanwhile, the BLM has already adopted a number of EMS elements. Foremost is BLM's Compliance Assessment - Safety, Health, and the Environment (CASHE) program, now in the third round of audits. Findings, root causes, and corrective actions are tracked, used to identify systemic problems, and evaluated against performance measures for continual improvements. In addition, the BLM offers a curriculum of in-house environmental compliance and hazardous materials management training for technical specialists and managers. One course in particular, Managers Guide to Environmental Compliance and Pollution Prevention, prepares managers to fulfill their legal responsibilities for environmental compliance and protection. It covers discretionary and nondiscretionary actions, institutional controls, risk management, and reducing liabilities.

3. EMS training for senior-level managers. CY 03 Objective – Agency has provided EMS training for appropriate agency-level senior managers.

No further information was provided by BLM specific to EMS training for senior level managers.

4. Agency EMS policy: CY 02 Objective – Agency top management has signed an agency EMS policy.

As previously stated, a formal EMS is currently being developed.

5. Program to conduct facility environmental compliance audits: CY 02 Objective – Agency has developed and implemented a program to conduct facility environmental compliance audits.

The BLM instituted its Compliance Assessment – Safety, Health, and the Environmental (CASHE) program in 1993. The purpose of the program is to evaluate all BLM facilities and operations in order to: 1) identify compliance issues and policy and training needs; 2) increase safety, health, and environmental awareness of all employees; 3) expand ownership for compliance by promoting implementation of collaborative solutions; and 4) facilitate budgeting for the implementation of those solutions. Specific benefits include: 1) improved protection of the public's and employees' safety and health; 2) prevention of environmental damage and accidents and potential savings of thousands of dollars in environmental restoration or worker's compensation costs; 3) enhanced opportunities for training personnel in environmental and hazardous material safety and health issues specific to BLM facilities and operations; and 4) improved transfer of environmental and hazardous material safety and health information and technology to the field.

Baseline CASHE audits have been completed at every field office and major facility in the BLM. Follow-up CASHE audits have been completed at over 85 percent of BLM organization units. In 2003, 42 audits were completed identifying over 1,500 facility compliance findings. The scope of CASHE audits was expanded in 2001 to include all occupational safety and health regulations and applicable nationally recognized standards related to facility compliance. This comprehensive scope helps to ensure that BLM field offices are complying with the regulation or standard that is most protective of human health and the environment. As a result, environmental regulatory exemptions that allow facilities to avoid being subject to a particular regulation are generally not applicable because the corresponding safety regulation or nationally recognized standard generally do not have such exemptions.

The BLM requires its field offices to update the status of their CASHE findings annually. This update is used to identify policy and funding requirements and has led to the BLM allocating a portion of its Infrastructure Improvements budget specifically for facility compliance. The Bureau's Annual Performance Plan includes a long-term goal to improve the safety, health, and environmental condition of its organizational units. Follow-up CASHE audits and the implementation of CASHE recommendations by the field provide the basis for measuring and reporting progress under that goal. A pilot electronic document management system to automate the documentation of facility compliance findings and track their completion is under development. This system is a component of the BLM's new Facilities Asset Management System.

6. Facility-level determination of “appropriate facilities” for EMS implementation. CY03 Objective – Agency has identified initial list of facilities where an EMS will be implemented.

No further information was provided by BLM specific to facility-level determination of appropriate facilities.

7. Facility EMS policy. CY03 Objective – Appropriate facilities have issued an EMS policy statement.

No further information was provided by BLM specific to facility EMS policy.

8. Facility implementation training. CY03 Objective – Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.

No further information was provided by BLM specific to facility implementation training.

9. Facility significant environmental aspects. CY 03 Objective – Appropriate facilities have identified and documented their significant environmental aspects.

No further information was provided by BLM specific to facility significant environmental aspects.

Other.

Environmentally and Economically Beneficial Landscape Practices.

As part of its routine land management practices, the BLM practices “Xeriscaping” i.e., the use of native plants and water conservation. Opportunities to apply environmentally and economically beneficial landscaping techniques are extensive. They range from Xeriscaping demonstration plots at offices and recreation sites to testing native vegetative covers on closed landfills and abandoned mine tailings. The BLM is using low water use native landscaping at the recently constructed facilities in the Grand Staircase-Escalante National Monument in Utah. In addition, the new Rawlins Field Office building in Wyoming will have water efficient landscaping, stormwater management, and erosion and sedimentation control.

The Bureau’s 2003 appropriation for new construction funded 14 projects that include extensive landscaping. Two visitor centers, two administrative buildings, one wild horse facility, and nine campgrounds and/or recreation sites are located in seven drought-stricken, western states. All of the projects will incorporate environmentally beneficial and fire resistant landscaping. Landscaping was also a significant part of the BLM’s deferred maintenance work in 2003. Projects included campground and recreation site improvements, rehabilitation of trails and trailheads, and road reconstruction. They incorporated native, drought-resistant plants and Xeriscaping. For example, reseeding along reconstructed roads in western Oregon will halt erosion and sedimentation of creeks, streams, and other anadromous fish habitats. Erosion and sedimentation cause turbidity, which degrades water quality and adversely impacts spawning

salmon and other threatened or endangers species.

Purchase of Environmentally Preferable Products.

The BLM's policy is to purchase environmentally preferable products. All service contracts include environmental preferability provisions. Procurement personnel have developed standard language and make sure that the appropriate green provisions are in all purchase agreements and contract documents. However, all purchasing is not done by procurement personnel. Most small purchases are made by employees with government bank cards and it is their responsibility to select green products. The Green Procurement icon on the BLM's Acquisition Internal Homepage opens extensive information about environmentally preferable purchasing, including a Power Point presentation, product information, and case studies. The product information specifically identifies Comprehensive Procurement Guideline items that BLM routinely purchases and gives vendor and ordering information.

BUREAU OF RECLAMATION

The Bureau of Reclamation (WBR) is pleased to provide the following information on its activities relating to E.O. 13148.

Reporting under Sections 502, 503, and 505 of E.O. 13148.

The Bureau of Reclamation (WBR) Regional Offices must ensure that their facilities comply with the provisions of the Sections 502, 503, and 505 of the Emergency Planning and Community Right-to-Know Act. This includes the development of: spill prevention, control and countermeasure plans (where required); emergency action plans; coordination with local emergency planning committees, and emergency responders including fire departments and local law enforcement. The WBR made all its offices aware of the requirement to coordinate the removal of ODS with the Department of Defense and is working on updating personal property management policies and procedures.

In addition, the WBR complies with Federal Acquisition Regulation (FAR) 52.223-11, ODS. This regulation requires that vendors offering products must certify compliance prior to contract award. This certification is incorporated into the contract by reference. Many WBR offices purchase products through the General Services Administration (GSA) catalog, which supplies products that comply with EO 13148. When a product is not available through GSA, employees are reminded to purchase products that do not contain ODS. One region reports that they continue to search for alternatives for halon and Sulfur Hexafluoride (SF6) as fire suppressing agents.

1. Resources. CY 03 Objective – Resources for EMS implementation are included in the agency's FY 04 budget request.

Resources for implementation are included in the agency's FY 2004 budget request. EMS is not a separate line item in the WBR budget, but is incorporated in operational budgets for Regional and Area Offices and the environmental portion of the WBR-wide program budget. The WBR

has one Bureau-level full time equivalent position supporting EMS staff in five Regional and two Area Offices (as collateral duties). The WBR is in the beginning stages of implementing an EMS program. Currently, FY 2004 funds (beyond staff) are limited, but two Area Offices have set aside funds for EMS implementation. The need for funding is recognized at the Regional level but funding re-allocation decisions have not been made.

2. Guidance. CY 03 Objective – Agency has issued EMS implementation guidance for use by appropriate facilities.

The WBR's Office of Program and Policy Services (OPPS) is responsible for developing Bureau-wide policy and directives and standards and for overall program coordination. Regional and Area Offices are responsible for facility-specific EMS implementation.

3. EMS training for senior-level managers. CY 03 Objective – Agency has provided EMS training for appropriate agency-level senior managers.

The WBR has briefed senior managers in the Washington Office and prepared a notebook of EMS resources for managers. Reclamation has made available EPA's web-based training materials and a generic manager's guide to interested Regional and Area Offices. Reclamation has prepared in-person training for senior managers WBR-wide; it has not been possible to schedule this training yet. The Director and Deputy Director of Operations, the Director, Policy Management and Technical Services, and the Director, OPPS, have all been individually briefed on EMS. Regional staff has briefed some individual facility managers, Area Office managers, and Regional Directors. The WBR's EMS coordinator and environmental auditing coordinator have attended several EPA-sponsored EMS training sessions. The EMS team will receive special training as it proceeds with its work. Several Regional EMS coordinators have attended EMS training as well. Two facilities have scheduled training for their staff at the next Regional senior management meeting to discuss EMS.

Mid Pacific Region: EPA Region IX (San Francisco, CA, Larry Woods, 415-972-3857) and Environment International (Seattle, WA, Pam Bridgen, 206-525-3362)

Yuma Area Office (YAO): HDR/Charis Corporation (Phoenix, AZ); OPPS: Prizim Inc., (Gaithersburg, MD, Frank Priznar, 301-840-9316).

4. Agency EMS policy: CY 02 Objective – Agency top management has signed an agency EMS policy.

The WBR has (via e-mail memorandum) issued guidance for a new EMS team. WBR has drafted an EMS policy, along with directives and standards, which are being reviewed by Reclamation's EMS team. WBR is relying on Departmental Manual guidance 515 DM 4 for general direction. The WBR regions and Area Offices are awaiting WBR-wide guidance to begin EMS implementation. The WBR policy will be issued by the Commissioner. WBR directives and standards will be issued by the Director, OPPS. A letter of intent from the Commissioner to region and Office Directors has been drafted and may be issued as soon as

spring 2004. The EMS program is acknowledged as a valuable initiative. As noted above, specific funding is being identified for the program within the overall budget for WBR.

The WBR's two pilot facility assessments will help identify the need for consistent audit procedures or protocols. The WBR considers life-cycle costing of its requirements, including environmental considerations. Furthermore, the Bureau-wide EMS Team will advise on EMS implementation and develop protocols as appropriate. In addition, one region has developed an EMS web page. With two facilities proceeding as pilot projects, WBR hopes to soon have experience on the costs and benefits of EMS implementation at Federal facilities.

5. Program to conduct facility environmental compliance audits: CY 02 Objective – Agency has developed and implemented a program to conduct facility environmental compliance audits.

The WBR has directive and standard, ENV 02-08, (Hazardous Materials and Hazardous Waste Auditing and Review Program Implementation) that addresses the WBR compliance audit program. It has been in place since 1996 and gives audit protocol and guidance. The program provides for conducting baseline audits of all Reclamation facilities, which are reasonably expected to purchase, use, store, treat, or dispose of hazardous materials/wastes through the course of their normal activities. Audits are conducted to determine facility compliance with applicable Federal, state, and local rules, regulations, and standards. The audit reports consist of a summary of findings based on the completed checklists applicable to the facility, including any necessary follow-up actions, and a transmittal letter or memorandum to the facility manager. An annual report is prepared and summarized to the Department's OEPC. Significant compliance issues and follow-up corrective actions identified in the audit report are tracked to monitor compliance. Recommendations and areas of concern may also be discussed in the audit report; however, these issues will not be tracked and will not require a follow-up audit.

6. Facility-level determination of “appropriate facilities” for EMS implementation. CY03 Objective – Agency has identified initial list of facilities where an EMS will be implemented.

The WBR's internal EMS team is defining “appropriate facility,” using the Interagency Environmental Leadership Workgroup definition as a starting point, and will identify the number of “appropriate facilities.” To date, two facilities have been informally identified. One region will complete nearly all of the baseline audits of project facilities in CY 2004. Information from these audits will be used to select facilities for EMS, once “appropriate facility” is defined.

7. Facility EMS policy. CY03 Objective – Appropriate facilities have issued an EMS policy statement.

Each Regional Office has an EMS coordinator (again, as collateral duty). Most commonly, it is the environmental auditing or hazardous materials coordinator. There are two Area Offices that have facility managers as their EMS coordinators. In addition, WBR's EMS team includes environmental branch chiefs and technical specialists. As materials are developed, they will be posted on the WBR web site to be made available for others.

8. Facility implementation training. CY03 Objective – Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.

One facility conducted informal training for facility staff in the fall of 2003. Another facility plans to conduct training for facility staff in spring 2004. Training in EMS is being scheduled for June 2004. The establishment of a Bureau-wide EMS team is a major accomplishment of 2003. The team will review draft policy and guidance and advise on EMS implementation. To date, one facility has issued an EMS policy statement: Lake Berryessa, California. When other facilities are identified for EMS implementation, training will be given to those employees who will be working on the facilities selected.

9. Facility significant environmental aspects. CY 03 Objective – Appropriate facilities have identified and documented their significant environmental aspects.

To date in WBR, one facility has identified its significant environmental aspects, and a second is in the process of doing so. The Yuma Area Office (YAO) conducted an EMS Gap Analysis during the fall of 2003 to see where YAO stands relative to general EMS requirements with respect to both strengths and needs for improvement. The Gap Analysis was based on the International Standards Organization (ISO) 14000 model. In addition to the Gap Analysis, a preliminary implementation plan with a schedule was prepared. Two facilities have conducted a Gap Analysis as ISO 14000: Desalting Plant and Office in Yuma, Arizona. A facility environmental management review took place in March 2004 at Lake Berryessa, California.

FISH AND WILDLIFE SERVICE

The Fish and Wildlife Service (FWS) reports the following E.O. 13148 activities for CY 2003.

Reporting under Sections 502, 503, and 505 of E.O. 13148.

There are no FWS facilities that report releases of toxic chemicals under provisions of the Emergency Planning and Community Right-to-Know Act (EPCRA). Consequently no baseline has been established. The FWS has published a policy manual chapter, dated 12/26/02; Ozone Depleting Substances (ODS), providing guidance for phasing out the use of Class I ODS's. The Chapter spells out procedures to schedule phasing out equipment that uses Class I ODS's.

1. Resources. CY 03 Objective – Resources for EMS implementation are included in the agency's FY 04 budget request.

The FWS has committed 2004 funds to successfully implement EMS at an estimated 24 facilities. A portion of the Division of Engineering's annual budget and a specific line item in the construction account were budgeted to address this program. A separate line item provides \$5,000 for each facility that has had an EMS implemented to assist them in getting their system off the ground. For the next five years, funds have been requested for implementation and maintenance of EMSs at appropriate facilities.

Three staff in the Environmental and Facility Compliance (EFC) Branch, Division of Engineering (DEN) allocate 25 percent of their time implementing and managing the EMS program. One Regional Environmental Compliance Coordinator in seven Regions allocates 15-20 percent of their time implementing and managing the EMS program. Two Regions provide one additional individual for four weeks during the field visits to appropriate facilities. No FTEs have been identified at headquarters or at the facility level.

2. Guidance. CY 03 Objective – Agency has issued EMS implementation guidance for use by appropriate facilities.

The FWS is a leader within the DOI for the implementation of EMS's. Director's Order No. 144 was published in May 2002 and serves as a policy statement for the FWS. The scope of the Order can be accessed through our website: <<http://policy.fws.gov/do144.html>>. The Order addresses greening initiatives in the Service through: Employee responsibilities, training, environmental audits, EMS, accountability through performance evaluations and awards, environmentally preferable procurement, contracting and designs, conservation planning, community outreach, energy management, landscape management, water and wastewater management and solid and hazardous waste management. A Director's memorandum (February 2003) reemphasizes management commitment, goals of the program and a schedule for the implementation of the service wide EMS

The FWS's Order was e-mailed to all employees and sent to each Regional Office for distribution to all FWS facilities. The scope of the Order was also accessed through our website <http://policy.fws.gov/do144.html>. Site visits to facilities through the environmental auditing program and environmental management systems are used to verify that policy has been implemented. The Order addresses greening initiatives in the Service through: employee responsibilities; training, environmental audits, EMS, accountability through performance evaluations and awards; environmentally preferable procurement, contracting and designs; conservation planning; community outreach; energy management; landscape management; water and wastewater management; and solid and hazardous waste management. The FWS has a standard template to implement EMS on a consistent basis Service wide.

3. EMS training for senior-level managers. CY 03 Objective – Agency has provided EMS training for appropriate agency-level senior managers.

FWS Senior level Managers in Washington, D.C., and Regional Offices were interviewed and educated about EMS and its planned implementation. In addition, Regional Environmental Compliance Coordinators have briefed senior staff at various Regional meetings. No outside training resources were used, but training was provided by an independent contractor, PRIZIM, Inc.

4. Agency EMS policy: CY 02 Objective – Agency top management has signed an agency EMS policy.

See response to question # 2 above.

5. Program to conduct facility environmental compliance audits: CY 02 Objective – Agency has developed and implemented a program to conduct facility environmental compliance audits.

The FWS initiated a comprehensive environmental compliance auditing program in 1994. The DEN developed a sustainable program by training and certifying Regional personnel while maintaining central control of an audit database, training and distribution of funds. Federal and state auditing handbooks are provided for auditor use in the field. The FWS is presently into its second cycle of audits.

6. Facility-level determination of “appropriate facilities” for EMS implementation. CY03 Objective – Agency has identified initial list of facilities where an EMS will be implemented.

No formal information is available on the criteria or process used to determine appropriate facilities, but a committee reviewed field stations and selected “appropriate facilities” based on: Criteria used were size, complexity and impact on the environment; number of personnel at the field stations (10 or more); and commitment of field station managers. A list of FWS appropriate facilities is contained in the Appendix.

7. Facility EMS policy. CY03 Objective – Appropriate facilities have issued an EMS policy statement.

All facilities that have implemented an EMS (24 facilities) have a signed facility EMS policy statement.

8. Facility implementation training. CY03 Objective – Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.

An EMS Inbrief, Buying Green Training and an EMS Outbrief constitute our informal training during EMS implementation visits at the facility level. The visited facilities have formed facility Environmental Management Teams (EMTs) to improve upon the EMS implementation process on a continual basis. The EMT will coordinate periodic training, along with their regularly scheduled staff meetings to enhance EMS implementation.

The FWS EMS implementation strategy for 2003 focused on EMS development at the field station level where FWS activities have the most direct and immediate impact on the environment. The FWS recognizes that EMS benefits can be realized at all field stations, regardless of size and complexity, but that EMS development will focus on field stations that are larger and more complex and have the *greatest* environmental aspects and impacts.

The FWS selected approximately 70 facilities and will implement EMS over a three-year period (FY 2003-2005) to meet the deadline of December 31, 2005. A training program, conducted by the Division of Engineering (DEN) in February 2003, provided a hands-on approach with a custom designed EMS Tool Kit on EMS implementation to the Regional Environmental Compliance Coordinators. The principle components of the tool kit are the model

Environmental Management Plans (EMPs), other EMS-related tools include model Standard Operating Procedures (SOPs) and other information such as Fact Sheets on specific subjects, projects, and related EMS requirements (i.e., greening initiatives). The tool kit will also evolve to include resources for general environmental program development, pollution prevention, model plans, resource lists and other information requested by field stations to help them meet environmental goals and targets. The environmental audit program is also part of the EMS implementation process and all facilities targeted for EMS are also audited at the same time.

A general EMP template was developed that is customized with every field visit. The EMP template provides a consolidated description of the EMS in place at the field station and includes the field station's environmental management policy, key environmental aspects and impacts of its operations, individual and collective roles and responsibilities of the field staff and the goals and targets established to improve the field station's environmental performance.

The EMP is divided into an introduction and ten sections: Policy, Aspects and Impacts, Goals and Targets, Responsibility and Accountability, Documents, Document Control and Information Management, Environmental Reporting, Communication regarding environmental matters, Environmental Training to promote sound environmental management, Budget as it relates to environmental programs and Monitoring, Measurement and Corrective Actions. The EMP is an Action Plan for the field station EMS. Other items included in the EMP are Standard Operating Procedures relating to day-to-day operations at the field station, Waste Inventories, Solid Waste Diversion Calculations and Finding sheets related to Environmental Audit that are performed during the field visit and a draft Energy Management Review.

The EMP implementation process usually takes one week for each facility. It includes an in-brief, facility walk-through, interviews, record review and an out-brief. The goal of the implementation process is to leave the facility with a fully finished product that they can review and modify to suit their needs. A six-month review process is established to encourage continuous improvement and a viable EMS. A framed policy statement that is customized for the facility is provided at the out-brief in order that they can display it at an appropriate place to inform visitors and employees about the station's commitment to environmental stewardship.

9. Facility significant environmental aspects. CY 03 Objective – Appropriate facilities have identified and documented their significant environmental aspects.

Appropriate facilities (24) have identified and documented their significant environmental aspects. The FWS is following EPA's Code of Environmental Management Principles (CEMP) standards and do not have any information to report this year on the EMS Self Declaration Protocol developed by the Interagency Workgroup. Implementation of the EMS will be monitored. The summary reports will be prepared to document the program. In obtaining and using such data, DEN can tailor support of the field station implementation effort, and the overall implementation strategy can be kept relevant to the needs of field stations and regions. Tools will be developed to assess the quality of information gathered from field stations. Such information will be disseminated to other field stations. Measures will be in place to ensure the quality of data provided to other parties. Any self-assessment tool developed for use by field stations in gathering information will be both user-friendly and robust. This will ensure a

standardized and comprehensive analysis of EMS activity.

Other.

We have not seen any cost savings, but our facilities have embraced the principles of energy conservation, alternative energy sources, alternative fuel vehicles, biobased lubricants, green procurement, environmental education and outreach, partnering, pollution prevention and solid waste diversion. Our Standard Operating Procedures (SOPs) have been willingly accepted and there seems to be a desire to improve environmental recordkeeping and documentation. Our review process will allow us to further evaluate the success of our program.

MINERALS MANAGEMENT SERVICE

The Minerals Management Service (MMS) did not report anything under Sections 502, 503, and 505 of E.O. 13148. Also, the MMS did not report on the questions relating to EMS.

Other.

The MMS pursues many activities to correct or avoid environmental problems. In addition to a wide array of operating regulations, lease stipulations and other mitigation measures, MMS encourages Outer Continental Shelf (OCS) operators to use a company-wide voluntary Safety and Environmental Management Program (SEMP) plan to organize their activities and their contractors' activities in ways that minimize risks to workers and the environment. SEMPs incorporate many of the features found in EMS programs. We also encourage and support offshore operators in implementing their own EMS plans according to standards such as ISO 14000. Many offshore operators have implemented such plans.

As the Federal agency responsible for managing the mineral resources on the OCS in an environmentally sound and safe manner, MMS recognizes that most offshore oil and gas incidents that lead to injuries and pollution can be traced to human error or poorly organized operations. The SEMPs are an excellent tool for integrating and managing fundamental drilling, construction, and production activities. The activities SEMPs address include:

Maintaining facility safety and environmental information; assessing operating hazards; managing changes to equipment and personnel; developing procedures for operating equipment; establishing safe work practices; training workers; assuring the quality and integrity of critical equipment; conducting a safety and environmental review before starting new or modified equipment; responding to emergencies; and investigating operating incidents.

The SEMPs were developed in response to the 1990 finding of the National Research Council's Marine Board that MMS's prescriptive approach to regulating offshore operations had forced industry into a compliance mentality. A more systematic approach to managing offshore operations was needed. The SEMPs are voluntary. All the principal offshore industry trade associations (i.e., American Petroleum Institute, Offshore Operators Committee, International Association of Geophysical Data Contractors, Independent Petroleum Association of America, and National Ocean Industries Association) support SEMPs and the MMS position that voluntary

implementation of SEMP is appropriate. Our best estimates indicate that approximately 6 of 10 OCS operators have a partially or fully implemented SEMP plan. How to create a company-level SEMP plan is documented in the API's Recommended Practice 75 (RP 75). Implementing API RP 75 will satisfy MMS's current expectations regarding SEMP.

It is MMS policy to collaborate with OCS operators to implement SEMP on a voluntary basis. Current MMS efforts to promote OCS operator participation in SEMP include accepting company invitations to participate in self-audit and discussing company SEMP efforts during annual performance reviews. The MMS is also represented on the API Technical Committee for RP-75, and through this committee, MMS can make recommendations for needed revisions to the SEMP guidance.

NATIONAL PARK SERVICE

The National Park Service (NPS) is pleased to report on the following activities relating to the implementation of E.O. 13148 in CY 2003.

Reporting under Sections 502, 503, and 505 of E.O. 13148.

The NPS developed the Director's Order (DO) 30A, Management of Hazardous Materials, Solid and Hazardous Waste and Environmental Contamination, which underwent revisions in CY 2003 and will undergo further review in CY 2004. This DO requires parks to annually inventory specific hazardous chemicals and determine if there are environmentally preferable substitutes. It also encourages parks to reduce on-site inventories of hazardous chemicals and materials. Additionally, as part of its Environmental Audit Program (EAP), the NPS audits parks on their efforts to develop and implement an environmentally preferable purchasing program. These criteria include stipulations for reducing the purchase of toxic chemicals. Finally, NPS is developing guidance documents to assist parks in reducing and managing toxic chemicals. These documents are available to parks on the Park Facility Management Division (PFMD) Intranet.

The NPS Concession Program has instituted specific procedures to help in reducing unnecessary use of toxic chemicals at NPS concession facilities. The Standard Concession Contract states that concessioners "shall submit to the Director, at least annually, an inventory of Occupational Safety and Health Administration (OSHA) designated hazardous chemicals used and stored in the area by the Concessioner." The current Standard Concession Contract language states that the use of "extremely hazardous chemicals by concessioners must also first be approved by the NPS Director. The Director may prohibit the use of any OSHA hazardous chemical by the Concessioner in operations under this contract." Concessioners are also encouraged to use environmentally preferable products in Concession Contracts, Operating and Maintenance Plans and through the Concession Environmental Audit System (CEAS) administered by the Concession Environmental Management Program (CoEMP).

The Interagency Workgroup has yet to develop the list of chemicals. Per Annual Report Guidance provided by the Department, no information is required at this time. DO 30A states that all parks must phase out the use of Class I ODS by December 31, 2010. Additionally, the

EAP includes criteria relating to chlorofluorocarbon and halon management, encouraging parks to scale back their purchase and consumption of these substances. Because of this influence, several parks have been proactive in the removal of halon from park facilities, and others are taking steps to develop phase-out plans. The NPS primary use of ODS is for facility and vehicle air conditioning. Therefore, the NPS would like to identify and acquire cost-effective ODS-free substitutes for its air conditioning needs. Unfortunately, this is proving to be quite a challenge for the NPS due to the lack of commercial availability of these substitutes. The NPS is eagerly anticipating the increase in supply of ODS-free air conditioning units, and plans to incorporate them into its purchasing programs once they are available at a reasonable price. Concessioners can contribute to the use of ODS in national parks. These ODS are used in air conditioning and refrigeration equipment in lodges, restaurants, and other visitor service facilities. Concessioners are encouraged to use less ODS through the CEAS and, where applicable, in Concession Contract specifications and requirements.

1. Resources. CY 03 Objective – Resources for EMS implementation are included in the agency’s FY 04 budget request.

Regarding financial resources, headquarters requested an additional \$5 million for EMS development and implementation for FY 2004 through the NPS Greenbook Process. Additionally, NPS has integrated an EMS component into its EAP, allowing park EMS activity to be reviewed during audits. Because these reviews are part of the audit, they are financially supported by the EAP budget.

The NPS Concession Program has dedicated \$600,000 in CY 2004 to administer the CoEMP in support of its mission to “provide assistance and guidance that advances the environmental performance of businesses offering visitor services in national parks.” There is no dedicated portion of this budget exclusively targeting EMS as most CoEMP activities provide technical support and guidance to assist concessioners in developing such systems. The CoEMP staff includes two full-time staff, a full-time research associate, a volunteer and an environmental consultant support. Of particular note is the Memorandum of Understanding (MOU) signed in March 2003 between the CoEMP and the United States Environmental Protection Agency (EPA) National Center for Environmental Innovation, which established a partnership between the NPS and EPA to share information, expertise, experiences, and resources – one purpose of which is to promote EMS approaches that are good for the environment and good for business. Through the MOU, EPA EMS resources have been identified and are readily available to NPS concessioners.

2. Guidance. CY 03 Objective – Agency has issued EMS implementation guidance for use by appropriate facilities.

To ensure adequate personnel resources for the development and implementation of a Servicewide EMS Program, NPS has acquired contractor support. Additionally, an EMS Task Group composed of NPS headquarters and regional staff has been formed to oversee Servicewide EMS efforts.

The NPS has made significant progress in developing guidance for EMS implementation throughout. The EMS Task Group convened twice in CY 2002 to discuss the NPS’ EMS

approach. The group assessed ISO 14001 standards and the EPA's Code of Environmental Management Principles (CEMP). The EMS Task Group felt that elements of both systems were relevant to parks and decided to develop a unique EMS program that borrowed from each approach and best addressed park needs; the NPS Model EMS. From the Model EMS, the NPS developed the EMS Toolkit, which provides step-by-step guidance for developing a park-level EMS. A draft of this EMS Toolkit was finalized and shared with pilot parks in CY 2003, and the final EMS Toolkit will be completed and distributed Servicewide in early CY 2004. The EMS Task Group also developed ideas for a sample EMS Manual and templates to accompany the EMS Toolkit and assist parks in this process. These guidance documents are designed to help parks create an EMS tailored to each park's unique set of activities, functions, and needs, but still provide for the Servicewide consistency desired by NPS leadership. NPS believes that this approach will result in the most effective EMS for each park. To provide additional support, NPS will offer a Help Desk/Hotline and EMS Website to assist parks as they develop their EMS, once the program is rolled out in CY 2004.

Concession Contracts authorize the provision of visitor services in national parks. The unique law, regulations, and policies that govern Concession Contracts and the multi-faceted commercial visitor service functions provided by concessioners vary from those services provided by parks. However, the services provided by businesses are integral to the overall success of advancing EMSs in national parks. This required a dedicated national program, the CoEMP, to develop EMS resources, training and tools geared toward businesses operating in a natural resource setting since the Standard Concession Contract requires concessioners to develop EMSs. (Section 6 of the Standard Concession Contract which was developed as a result of 36 CFR 51 in FR 26052-26086 and was last revised on May 4, 2000 requires all concessioners being issued new Concession Contracts who are assigned NPS facilities, i.e., Category I or II Concession Contracts to develop EMSs. The EMSs developed by concessioners must adhere to the outline/elements defined and described in the Concession Contract.)

To assist concessioners in developing these programs, the CoEMP made general EMS resources and manuals available to parks and concessioners through two main avenues – the GreenLine Compact Diskett (CD) and the Concession Program Website. Version 1.0 of the GreenLine CD includes EPA EMS resources that target primarily small and medium-sized businesses, which comprise the majority of concessioners working in the NPS. The CD also includes links to EMS Internet resources to which users can connect if they are online. It was distributed to all parks and concessioners who had undergone an environmental audit and to those who requested it on an as-needed basis throughout the year. The Concession Program Website <<http://www.concessions.nps.gov>>. includes a CoEMP section, the content of which is identical to that of the GreenLine CD except for the posting of more updated resources. It has been widely publicized in interactions with parks and concessioners since it was posted online in October 2003.

The CoEMP has also developed and updated 10 guidance documents specific to visitor services provided by NPS concessioners who are subject to Concession Contract EMS requirements. These guidance documents include those for bicycle, ferry, float trip, food service, golf course, horse and stable, lodging, marina, remote cabin, and retail facilities and services; and have been distributed on an as-needed basis to parks and current concessioners in need of specific, timely

EMS assistance. While these guidance documents have not yet been included on the GreenLine CD or posted to the Concession Program website, they will be made more widely available once the NPS has finalized its NPS EMS program, the CoEMP has updated the guidance documents to be consistent with the NPS EMS program, and the CoEMP has obtained legal approval. Guidance documents are anticipated to be developed for all service types.

The NPS PFMD team representatives gave a presentation to the Servicewide Maintenance Advisory Committee, which consists of Regional Chiefs Maintenance staff, to inform them of current and planned NPS EMS-related activities and the amount of resources that will be dedicated to these efforts as NPS moves forward. The NPS plans to keep senior-level management fully informed of the development of Servicewide EMS activities. In order to be cost-effective, it is likely that EMS training will be incorporated into existing senior-level manager training.

3. EMS training for senior-level managers. CY 03 Objective – Agency has provided EMS training for appropriate agency-level senior managers.

Senior NPS management is routinely briefed on the CoEMP and its activities. Training related to concessioner environmental management was presented in one Concession Contract training for NPS concession management, concession staff, and park managers. The CoEMP continues to update Concession Contract trainings to provide timely information on concession environmental management to park management and concession staff.

The CoEMP also plans to review the current resource protection module in the hospitality management certification program developed in partnership with the Northern Arizona University School of Hospitality and integrate concession environmental management issues; review the concession evaluation and pricing training agenda and integrate concession environmental management topics; and survey other current NPS training agendas (such as integrated pest management, hazard communication, hazardous waste operations and emergency response trainings), to determine whether concession environmental management issues could be integrated into existing training opportunities.

4. Agency EMS policy: CY 02 Objective – Agency top management has signed an agency EMS policy.

The NPS finalized DO 13A: Environmental Management Systems, to establish a Servicewide EMS policy. This DO articulates the principles and priorities of NPS environmental management system development. Specifically, this DO outlines NPS policy for developing and implementing a facility-specific EMS that guides environmental decision-making and actions at all NPS levels to ensure compliance with regulatory requirements and a commitment to pollution prevention, sustainable planning, and the use of environmental best management practices. This DO provides overarching guidance for all other DOs, mandates, regulations, and other guidance that governs implementation of our environmental management responsibilities. This DO also provides a framework for other decisions that may involve environmental evaluations where no stand-alone DO exists, such as procurement. This DO recognizes and supports actions that have taken place in parks and regional offices that have furthered development and

implementation of EMS, and builds on the successful efforts to create a systematic approach to this issue.

This DO sets forth the policy and special delegations under which the NPS will develop and implement an EMS consistent with the requirements of the EO. Additional guidance on procedures and requirements will be developed in Reference Manual 13. The CoEMP is responsible for operating in accordance with applicable environmental management requirements provided in DO 13A. In addition, the NPS Concession Program is subject to specific policy requirements concerning environmental management contained in Concession Program regulations (36 CFR, Part 51) and the 2001 NPS Management Policies. Chapter 10 of the 2001 NPS Management Policies, Commercial Visitor Services, includes a section titled “Environmental Program Requirements” that outlines NPS Concession Program responsibilities for ensuring concessioners support and advance NPS environmental management goals and standards.

5. Program to conduct facility environmental compliance audits: CY 02 Objective – Agency has developed and implemented a program to conduct facility environmental compliance audits.

The NPS leadership completed baseline environmental audits in every applicable park in CY 2002 and conducted routine (i.e., follow-up) audits at 46 applicable parks in CY 2003. In order to capture and organize the results of these audits and make the information available to all relevant stakeholders, NPS developed an on-line database tracking system. This database was utilized in CY 2002 and continued to operate in CY 2003.

Environmental audits of concessioners are administered by the CoEMP through the CEAS. To the greatest extent possible, the CEAS is consistent with the NPS EAP Operating Guide. However, due to the unique programmatic, contractual and corresponding legal issues associated with managing businesses operating in parks, certain NPS EAP criteria and field procedures are modified or amended in the CEAS. To date, the CEAS has completed 87 site visit audits of concession operations. The CEAS is a part of the NPS EAP and uses the EAP Handbook as a basis, however, it is augmented with concessioner-specific criteria and procedures to address unique concessioner issues. A CEAS Operating Guide has been developed and will be undergoing legal review and public comment in CY 2004.

6. Facility-level determination of “appropriate facilities” for EMS implementation. CY03 Objective – Agency has identified initial list of facilities where an EMS will be implemented.

Because the NPS sees great value in EMS implementation for facilities of all types and sizes, headquarters determined that all facilities (i.e., parks) are appropriate facilities. Therefore, all parks will be encouraged to take advantage of the NPS EMS Toolkit and implement an EMS by the end of CY 2005. Some of the small parks or parks with the same park superintendent may joint together and have one EMS. The current list of NPS “appropriate facilities” is provided in the Appendix.

Concessioners operate as contracted entities within the park. Oversight and management of these contracted entities will be accounted for and addressed in the respective park EMS. However, the NPS also requires, through the Standard Concession Contract and its Concession Management Policies, that concessioners develop their own EMS' to address the aspects and impacts resulting from the provision of the visitor services. The scope of a concessioner's EMS will vary based on the type, size, and number of facilities assigned to a concessioner and/or the scope of services provided. Concession Contracts are grouped into three categories. Generally, Category I and II Concession Contracts have NPS facilities assigned to the concessioner. Category III Concession Contracts are those that do not have NPS facilities assigned to the concessioner and are, in general, smaller and less complex than Category I and II. Because of their more limited operations, the majority of concessioners with Category III Concession Contracts are not required to develop and implement written EMS', although they are required to adopt appropriate Best Management Practices. Yet, specific environmental criteria and/or standards can be included in Category III Concession Contracts as appropriate. The current list of CoEMP "appropriate facilities" is provided as Attachment B.

7. Facility EMS policy. CY03 Objective – Appropriate facilities have issued an EMS policy statement.

Based on the list of appropriate facilities for NPS, 10 parks have organized an Environmental Management Team and developed facility Environmental Commitment Statement in CY 2003. As mentioned above, Category I and II Concession Contracts require the development and implementation of an EMS. One of the nine required EMS elements identified in Section 6 of the Category I and II Standard Concession Contract is a policy, which requires a clear statement of a concessioner's commitment to Environmental Management Objectives. As new Concession Contracts are issued, it is expected the EMS' developed will include this policy statement. When the park superintendent reviews a concessioner's EMS, it is expected that the policy will be reviewed to ensure it is in compliance with the Concession Contract. When requested by parks, the CoEMP has reviewed the draft documented EMS' of concessioners; the CoEMP has reviewed 22 EMS' of these 36 appropriate facilities.

8. Facility implementation training. CY03 Objective – Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.

Based on the list of appropriate facilities for NPS, 11 parks have conducted EMS training for the facility staff that will develop and implement the EMS in CY 2003. One of the nine required EMS elements identified in Section 6 of the Category I and II Standard Concession Contract is Training, which requires that a concessioner describe its environmental training, including identifying staff that should be trained, training subjects, training frequency, and how training will be documented. As new Concession Contracts are issued, it is expected the EMS' developed will include this training element. When the park superintendent reviews a concessioner's EMS, it is expected that inclusion of a training section will be reviewed to ensure compliance with the Concession Contract.

9. Facility significant environmental aspects. CY 03 Objective – Appropriate facilities have identified and documented their significant environmental aspects.

Based on the list of appropriate facilities for NPS, 10 parks have identified and documented their significant environmental aspects in CY 2003. Section 6 of the Category I and II Standard Concession Contract describes how a concessioner will develop, document, implement, and comply with a comprehensive EMS. As new Concession Contracts are issued, it is expected the EMS' developed will document a concessioner's significant environmental aspects. When the park superintendent reviews a concessioner's EMS, it is expected that inclusion of significant environmental aspects will be reviewed to ensure compliance with the Concession Contract.

To obtain copies of the EMS guidance documents, CoEMP training materials and/or the GreenLine CD, Federal agencies can contact the CoEMP by calling the CoEMP's GreenLine Telephone Number 303-987-6919 or by e-mail: <<http://www.greenline.nps.gov>>.

Other.

Centralized Procurement.

In CY 2003, the NPS EMP re-invigorated the initiative to expand its Servicewide Environmental Purchasing Program (SEPP). As a first step, the EMP has laid the groundwork for close coordination to take place with the NPS procurement community throughout all phases of the project. The EMP's goal being to gain a full understanding of the best procurement mechanisms needed in order to effectively increase the purchase and use of environmentally preferable products and services. Consistent with this on-going effort, the NPS plans to explore the most effective and efficient ways to: (1) prioritize SEPP efforts considering environmental impacts, total value of purchase, compliance with executive order requirements, (e.g. E.O. 13148, etc.); (2) define what constitutes a green product; (3) integrate green aspects into the procurement procedures; and (4) reach and engage the procurement as well as program and end-user communities (e.g., through formal orientation and training sessions).

Once the study is completed, and the SEPP framework is developed, the SEPP will be piloted in one specific NPS region in an effort to identify and test tools and mechanisms that can assist in full Servicewide implementation. Continual feedback mechanisms will be set in place to allow NPS field units and SEPP designers to interact as mechanisms and guidance tools are developed, thus ensuring the highest efficacy. The CoEMP is developing concessioner specific environmental purchasing guidance. Concessioners have participated in environmental purchasing training conducted throughout the Pacific West Region.

OFFICE OF SURFACE MINING

The Office of Surface Mining (OSM) did not report anything under Sections 502, 503, and 505 of E.O. 13148. However, OSM did report on agency EMS policy (question # 4) but did not report on any of the other questions (1-3, 5-9).

4. Agency EMS policy: CY 02 Objective – Agency top management has signed an agency EMS policy.

The OSM has developed a written EMS policy and when finalized it will be sent to all OSM offices with implementation guidance. An OSM EMS national team will be convened across the various disciplines in OSM to ensure that a practical and realistic EMS program is implemented throughout the agency. OSM also is a member of the Departmental EMS Council to address departmental issues.

Other.

Although OSM does not own, operate, or maintain facilities subject to the requirements of EO 13148, it supports Departmental efforts to develop sound EMS. OSM actively promotes environmentally-friendly practices under other Greening executive orders, including those governing procurement, recycling and waste prevention. As a member of the Interior planning group carrying out the mandates of EO 13101, OSM played a key role in developing the Strategic Plan for Greening the Department of the Interior through Waste Prevention, Recycling and Federal Acquisition. Following the release of the strategic plan in May 2000, OSM actively worked with other Interior Bureaus and Offices in preparing a detailed action plan describing the specific steps the Department will take to implement the Greening strategy.

The OSM serves on the Departmental committee developing the second annual memorandum of understanding (MOU) with UNICOR—the trade name for the Federal Prison Industries. The MOU on Recycling and Reuse of Electronic and automation Equipment supports both E.O. 13101 and E.O. 13148. For the past four years OSM has participated in the transit subsidies program authorized under E.O. 13150 – Federal Workforce Transportation. And, where feasible follows the guidelines for procurement of Alternative Fueled Vehicles and reduction of fossil fuel usage, in support of E.O. 13149 – Greening the Government through Federal Fleet and Transportation Efficiency.

U. S. GEOLOGICAL SURVEY

As a generalization, the U.S. Geological Survey (USGS) has taken a decentralized approach to managing the requirements of this section, with local level supervisors and managers responsible herein. Local efforts have resulted in unused chemicals destined for disposal or treatment at headquarters and regional facilities being offered to other organizations for use, resulting in waste reduction and disposal costs.

Reporting under Sections 502, 503, and 505 of E.O. 13148.

A realistic plan to meet the goal to phase out Class I ODS by December 31, 2010, will be developed as the EMS process matures. The Bureau EMS Council will establish Bureau ODS reduction goals and targets based on the reduction requirements of this section. A Bureau plan will be implemented utilizing the EMS concept of continual improvement of phasing out Class I ODS by the target date.

1. Resources. CY 03 Objective – Resources for EMS implementation are included in the agency's FY 04 budget request.

Resources for EMS are included as a part of the overall safety, health, and environmental budget request. In FY 2003, \$56,000 was allocated for the implementation of gap analyses and the pilot program. An additional \$55,000 was requested and allocated for FY 2004 for EMS implementation and program review. The EMS templates and guidance are drafted and uploaded onto the intranet environmental programs page. Efforts are underway to locate an appropriate electronic tool to assist with the administrative and recordkeeping requirements associated with the operation of an effective EMS. As previously stated, resources for EMS are included in the overall safety, health, and environmental budget. The Bureau Safety Manager allocates resources to Bureau projects based on elements identified in the annual work plan. Resources at the regional and field office levels are allocated out of their respective budgets.

The Bureau Safety and Environmental Management Branch (SEMB) is the organization responsible for the Bureau wide implementation of EMS at the U.S. Geological Survey (USGS). The SEMB has one full-time equivalent (FTE) engaged with EMS implementation augmented by a contractor, Prizim, who conducted the gap analyses and is providing assistance with the pilot facility implementation, and assisting with establishing EMS facility training. Each of the three regional safety offices has one FTE dedicated to EMS implementation and provides regional guidance to field locations. A Collateral-Duty Environmental Program Coordinator (CDEPC) is assigned at each facility. They will serve as the EMC coordinator at the appropriate facilities. No major obstacles have been encountered to date. Most managers interviewed during the gap analysis phase of this project stated they understood the advantages of EMS and seemed eager to get started.

2. Guidance. CY 03 Objective – Agency has issued EMS implementation guidance for use by appropriate facilities.

The EMS guidance, templates, and a variety of EMS worksheets were developed by SEMB to assist facilities with the planning and implementation of their individual EMS. Although the guidance is not directive in nature, it is written in such a way that facilities using step-by-step guidance will have a working EMS upon completion. The Bureau EMS contractor will be drafting an EMS Manual to be used as a template Bureau wide. The intent is for all facilities, determined to be appropriate for EMS, will simply have to edit the EMS manual to match their operations. This guidance has not been fielded to date, but the draft is being reviewed by SEMB. The guidance and templates are placed on the intranet in a separate portal accessible through the USGS Environmental Management Web site. Additionally, the templates and guidance are being loaded onto Web Based Compliance Assistance System (WEBCASS) for increased accessibility. The EMS manual has not been fielded. The plan for fielding the EMS manual is through the Environmental Web site and WEBCASS. Thus far, the guidance developed for the USGS taken from several sources and is fairly generic. Additional guidance will be developed by the Bureau EMS Council that is more USGS-specific.

3. EMS training for senior-level managers. CY 03 Objective – Agency has provided EMS training for appropriate agency-level senior managers.

The USGS Executive Leadership Team (ELT) received EMS training in the form of an informational briefing in February 2003. EMS is included in the Web-based Department of the

Interior University (DOIU) Executive Training Modules developed by USGS. Generic training materials edited for specific use at the USGS were used to present training. No other agency-specific training has been developed. All GS-15's and above are the target audience for this training. The following members of the USGS, ELT have received training on EMS:

Amy Holley, Science Advisor to the Director; Doug Buffington, Regional Director, Western Region; Thomas Casadevall, Regional Director, Central Region; Bonnie McGregor, Regional Director, Eastern Region; Barbara Ryan, Associate Director, Geography; Pat Leahy, Associate Director, Geology; Karen Siderelis, Geographic Information Officer; Carol Aten, Chief, Office of Administrative Policy and Services; and Barbara Wainman, Chief, Office of Communications

The following members of the USGS, ELT remain to receive EMS training: Charles Groat, Director, USGS; Robert Doyle, Deputy Director, USGS; Susan Haseltine, Associate Director, Biology; Robert Hirsh, Associate Director, Water; and Carla Burzyk, Chief, Office of Budget.

The following are the subject areas covered in the training: environmental program overview-staffing and support structure; what an EMS is, EMS requirements, EMS components and essential elements, EMS continual cycle, organizational and environmental benefits of EMS, current EMS initiatives, next steps, proposed implementation, EMS challenges, and "the good news." No outside sources have been used to provide EMS training

4. Agency EMS policy: CY 02 Objective – Agency top management has signed an agency EMS policy.

The Director of the USGS issued an EMS directive and his Environmental Management Policy and Commitment Statement on December 29, 2003 (included as attachment 1). His directive includes: an endorsement of the Secretary's EMS directive; a directive to all disciplines and facilities to implement EMS by December 31, 2005; a directive to charter a Bureau EMS Council chaired by the Bureau Environmental Program Manager with key headquarters, regional, and field representatives; and a directive to the Executive Leadership Team (ELT) to endorse the USGS Environmental Management Policy and Commitment Statement and to ensure the Bureau policy is prominently posted in each facility.

5. Program to conduct facility environmental compliance audits: CY 02 Objective – Agency has developed and implemented a program to conduct facility environmental compliance audits.

USGS has an established environmental compliance audit program.

6. Facility-level determination of "appropriate facilities" for EMS implementation. CY03 Objective – Agency has identified initial list of facilities where an EMS will be implemented.

The USGS used a risk-based approach to identify which facilities were required to be included in the environmental compliance audit program by receiving a comprehensive external environmental audit. A facility questionnaire was fielded in CY 1999 to gather facility

operational information to assist with this identification process. The USGS used the information gathered from these facility questionnaires to identify the “appropriate facilities” for initial EMS implementation. These facilities are identified in the Appendix.

7. Facility EMS policy. CY03 Objective – Appropriate facilities have issued an EMS policy statement.

Each facility is instructed by the USGS Director in his December 29, 2003, environmental commitment letter to endorse and prominently post the Bureau policy. Facility policy statement templates and guidance are posted on the USGS Environmental Management Intranet Web site to aid all facilities with the preparation of their policy statements.

8. Facility implementation training. CY03 Objective – Appropriate facilities have provided EMS implementation training to the personnel responsible for implementing EMS.

Implementation training is scheduled for the pilot project facilities on March 30 and 31, 2004, at the Leetown Science Center, West Virginia. Furthermore, the SEMB is developing, in conjunction with DOIU, Web-based EMS awareness and implementation modules to be included in the mandatory CDEPC and supervisor courses. The target date for completion of these two courses is July 31, 2004.

9. Facility significant environmental aspects. CY 03 Objective – Appropriate facilities have identified and documented their significant environmental aspects.

The USGS is in the process of establishing EMS at pilot facilities to assist with understanding the process, as models for the other facilities, and to demonstrate the effectiveness of EMS to management. To further aid the appropriate facilities with identifying their significant aspects, the EMS contractor is drafting a generic list of potential aspects associated with the operation of scientific research facilities. The generic aspect list will be incorporated in the EMS manual and posted on the USGS Environmental Management intranet Website and WEBCASS.

APPENDIX

1. Improving Environmental Compliance and Performance through Environmental Management Systems, DOI Secretarial Memorandum of August 26, 2003.
2. DOI EMS Council Bureau and Office Contacts.
3. FWS, NPS, USGS List of “Appropriate Facilities.”
4. NPS Concessions Contracts List.

Improving Environmental Compliance and Performance through
Environmental Management Systems, DOI Secretarial
Memorandum of August 26, 2003

DOI EMS Council Bureau and Office Contacts

Calendar Year 2003 DOI Annual Report
FWS, NPS, and USGS List of “Appropriate Facilities”

NPS Concessions Contracts List